



SDMS DocID

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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

ORIGINAL

November 29, 2012

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Required Submission of Information  
Safety Light Corporation Superfund Site  
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

Pursuant to the Section 104(e) request for information on the above listed Superfund site, please see attached response.

Sincerely,

Tony King  
President  
RFL Electronics Inc.

Enclosures: RFL Electronics Inc. Response to EPA Request  
RFL Electronics Inc. Current Record Retention Policy and Procedure

**RFL Electronics Inc.**

Corporate Headquarters \* 353 Powerville Road \* Boonton Twp., New Jersey 07005-9151 \* USA

Tel: 973-334-3100 \* Fax: 973-334-3863 \* Web: [www.rflect.com](http://www.rflect.com)

ISO 9001-2008 Registered Company

**Electronics Since 1922**

In the Matter of	:	
Safety Light Corporation	:	<b>RFL Electronics Inc.</b>
Superfund Site	:	<b>Response to Request</b>
Bloomsburg, Pennsylvania	:	<b>for Information</b>

In response to the United States Environmental Protection Agency ("EPA") request for information (the "Request") pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9604(e) ("CERCLA") with respect to the Safety Light Corporation Site adjacent to the Susquehanna River off Old Berwick Road, Bloomsburg, Columbia County, Pennsylvania (the "Site"), RFL Industries, now known as RFL Electronics Inc. ("RFL"), provides the following information.

**Information Requested:**

For the time period 1945 to the present, please answer the following questions in accordance with the Instructions set forth above.

1. Describe in detail any and all business relationship(s) between RFL and Safety Light or its affiliates, as defined above and in the enclosed Definitions.

RFL Response – Based on an extensive search of RFL records dating from 1945 to present, the relationship between RFL and Safety Light is believed to be limited to that described in the documentation provided by EPA. The following areas were researched:

- Cash books and general ledgers
- Electronic records of vendors and customers
- Additional General Corporate records
- Tax records
- Environmental records

2. Did RFL ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site?

RFL Response – RFL has no knowledge regarding any transportation, shipment or sending, or arrangement for any transportation or shipment, of radioactive materials or items containing radionuclides to the Site.

3. Did RFL ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated?

RFL Response - RFL has no knowledge regarding any sending, transportation or shipment, or arranging for any transportation or shipment, of radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated.

4. If you answered "yes" to Question 2 or Question 3, please respond to the following:

RFL Response – Not applicable, see response to Questions 2 and 3.

- a. Provide the time period during which each such transaction occurred.
- b. Provide the purpose or reason for each such transaction.
- c. For each and every transaction, provide:
  - i. the entity to which you sent radioactive materials or items containing radionuclides (i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Incorporated);

- ii. a detailed description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item(s);
  - iii. the method used to send or transport such radioactive materials or items to the Site (e.g., hauler, U.S. mail, etc.);
  - iv. the date(s) of the pickup and delivery of radioactive material or item(s) containing radionuclides;
  - v. all documents relating to the transaction, including but not limited to invoices, and correspondence regarding the type, amount, and transportation/disposal of the radioactive material or item(s) containing radionuclides to the Site;
  - vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site, and/or to the entities identified in Question 3.
- d. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of radioactive material or item(s) containing radionuclides, explain these arrangements and provide all documentation relating to those transactions. In addition, please identify:
- i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the persons who selected the Site as the place at which materials were disposed or treated;
  - v. the names of employees, officers, owners, and agents for each transporter.
- e. For each and every instance in which you/your company arranged for radioactive material to the Site, identify:
- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and
  - ii. any billing information and documents (invoices, trip tickets, manifests) in

your possession regarding arrangements made with your company to generate, treat, store, transport, and/or ship materials to the Site.

- iii. the names, titles, and areas of responsibility of any persons, including all RFL employees, present and former, who were involved in or would have knowledge of such arrangements.
  - f. Describe any permits or applications and any correspondence between RFL and any regulatory agencies regarding materials transported to or disposed of at the Site.
  - g. Provide copies of any correspondence between RFL and any third party regarding materials transported to or disposed of at the Site.
  - h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
  - i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
5. Did RFL ever generate other waste(s), not described in response to Questions 2 or 3, above, that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site? If yes, please provide a detailed description of such other waste(s) and any and all related documentation.

RFL Response – RFL has no knowledge of any wastes disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site. RFL was unable to find any records regarding disposal or reclamation of waste by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

6. For each question above, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

RFL Response – The following persons managed the researching and providing documents in the course of preparing RFL's responses.

William Higinbotham, VP Engineering (New product development & facility management)  
RFL, 353 Powerville Road, Boonton, NJ 07005-9151  
(973) 334-3100

Debbie Chen, VP Finance (Finance & Accounting)  
RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100

Tony King, President  
RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100

Traci Jennings, Executive Assistant  
RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100

Steve Gilliatt, former President (retired 2011),  
c/o RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100 Ext. 229

Jack Slater, former Facility Manager (retired 1994),  
c/o RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100 Ext. 229

Ursula Pfeil, former VP Finance (retired 2008),  
c/o RFL, 353 Powerville Road, Boonton NJ 07005-9151  
(973) 334-3100 Ext. 229

7. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

RFL Response – RFL is not aware of any persons able to provide more detailed or complete responses.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

RFL Response – RFL does not have any other information about any other parties who may have information that might assist EPA, or who may be responsible for generation, transportation or release of contamination at the Site.

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

a. Your document retention policy;

RFL Response – RFL has no reason to believe that documents solicited by the Request are no longer available. RFL's current document retention policy is attached to this response. RFL has no record of its document retention policy in and around 1968. RFL's diligent review of its records indicates that, as it relates to environmental documentation, RFL retained relevant documents for a long time, such as documents from the 1970s and 1980s relating to the operation, permitting and closure of a sludge lagoon in Boonton, New Jersey.

b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

RFL Response – Not applicable. See response to Question 9.a.

c. A description of the type of information that would have been contained in the documents; and

RFL Response – Not applicable. See response to Question 9.a.

d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

RFL Response – Not applicable. See response to Question 9.a.

## RFL Electronics Inc.

THIS DOCUMENT IS ISSUED AND CONTROLLED BY THE QUALITY ASSURANCE MANAGER. THIS IS A CONTROLLED DOCUMENT SUBJECT TO CHANGE AT ANY TIME, AND THEREFORE, SHOULD NOT BE COPIED. ONLY SIGNED, AUTHORIZED COPIES MAY BE USED AS WORKING DOCUMENTS.

QA MANAGER \_\_\_\_\_ DATE \_\_\_\_\_

### QMS PROCEDURE

SUBJECT: <b>RECORD RETENTION POLICY AND PROCEDURE</b>	EFFECTIVE DATE: <b>MARCH 2, 2005</b>	NO: <b>QP-109</b>	REV: <b>A</b>	
	ISSUED BY: <b>D. CHEN</b>			
	APPROVED BY: <b>U. PFEIL</b>	PAGE <b>1</b> OF <b>7</b>		
REVISION	DESCRIPTION	BY	APPROVED	DATE
<b>A</b>	<b>INITIAL ISSUE</b>	<b>DC</b>	<b>UP</b>	<b>03/02/05</b>

### 1.0 PURPOSE

- 1.1 To document the policy and procedure to be followed regarding retention of Company records, in paper or electronic format. This policy and procedure also provides detailed retention schedules for records in paper format, and systems, data, and files maintained and retained in electronic format.

### 2.0 SCOPE

- 2.1 This policy refers to paper records and documents and also systems, data and files in electronic format.
- 2.2 The Retention Schedule for paper records and documents outlining the retention period is provided in Section 4.0. Any question regarding document retention should be directed to the Controller or Officer in charge.
- 2.3 The Retention Schedule for electronic systems, data, files and documents is provided in Section 5.0. Any question regarding system, data, file or document retention should be directed to the Controller, Officer in charged, or IT Director.
- 2.4 The responsibility for record retention and compliance with this policy rests with the Supervisors, Managers, Controller, Officers as and IT Director as applicable.

### 3.0 POLICY AND PROCEDURE

- 3.1 Retention requirements generally are statutory and records placed in storage deserve as much care as current records. All, users as well as Supervisors and Managers or IT Director, must assure ease of retrieval whether paper or electronic format.



RFL Electronics Inc.			
SUBJECT: <b>RECORD RETENTION POLICY AND PROCEDURE</b>	EFFECTIVE DATE: <b>MARCH 1, 2005</b>	NO: <b>QP-109</b>	REV: <b>A</b>
	ISSUED BY: <b>D. CHEN</b>		
	APPROVED BY: <b>U. PFEIL</b>	<b>PAGE 2 OF 7</b>	

- 3.2 All statutory paper records must be stored based on fiscal year, unless another period is specifically directed by the Controller or dictated by the type of document. Reference Section 4.0, "Record Retention Schedule" for detail.
- 3.3 Permanent paper records should be stored in pre-assigned file cabinets stationed at the record storage facility whenever possible.
- 3.4 Sensitive paper records, such as wage and personnel data, must be stored in locked cabinets stationed at the records storage facility.
- 3.5 All paper records (other than permanent and sensitive records) must be placed into trans-file boxes. This includes binders containing EDP reports, loose-leaf books, etc.
- 3.6 Responsibility of the "Paper" Record Originator
  - 3.6.1 Maintain an adequate and accurate filing system during the year.
  - 3.6.2 After completion of the annual accounting audit by external auditors, financial records for the year audited are moved into trans-file boxes. Other records are moved to storage as per the Retention Schedule.
  - 3.6.3 Prepare a retention label and affix to each trans-file box. Fill in "all" items accurately using a black marking pen.
    - 3.6.3.1 If multiple items are in a box, two labels may be affixed to the box.
    - 3.6.3.2 "Title" refers to discipline, i.e., Accounts Payable, Payroll, etc.
    - 3.6.3.3 "Content" refers to detail description, i.e., monthly labor distribution, paid invoices, etc.
    - 3.6.3.4 "Series" refers to beginning and ending identifier of content, i.e., A-B or MC-Z.
    - 3.6.3.5 "Box" refers to the total number of boxes containing like items, i.e., box 2 of 6 (paid invoices).
    - 3.6.3.5 "Period" refers to time frame of content, usually fiscal year beginning and ending or calendar year.

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	<b>ISSUED BY:</b> <b>D. CHEN</b>	<b>QP-109</b>	<b>A</b>
	<b>APPROVED BY:</b> <b>U. PFEIL</b>	<b>PAGE 3 OF 7</b>	

3.6.3.6 "Retention Period" refers to number of years record must be retained reference Record Retention Schedule or check with the Controller.

3.6.3.7 "Disposal Date" refers to the month and year the record may be discarded. Ensure that the records are kept through the last date of the retention period, e.g. calendar year 2004 record to be retained for 4 years – disposal date 1/09.

3.6.3.8 "Filed By"- Print name of person who prepared the records for storage and list department number.

3.6.3.9 "Approved By" requires Supervisor signature and date representing review of content and certifying accuracy of the data shown on retention label.

### 3.7 Moving "Paper" Record Files to Storage

3.7.1 Originator contacts the Maintenance Supervisor to initiate transport of retention boxes to the retention storage facility.

3.7.2 Maintenance Supervisor contacts the Controller's office, indicates quantity of to be stored and obtains direction for placing items in pre-assigned storage area. Note: Sensitive and Confidential Records are stored in locked storage cabinets or storage areas. The Controller maintains security and access to such areas.

3.7.3 The Controller will issue red "Storage Approval Stickers" and affix it to each box placed into the record storage facility.

3.7.4 The Controller's office will assume responsibility for the record storage facility arrangements and supervise disposition of expired records.

### 3.8 Retrieval of Stored "Paper" Records

3.8.1 Record User or Supervisor must ensure that if records are removed from storage during the year for reference and/or audits, they must promptly be returned to and properly re-filed into the original storage area and proper storage location. It will be the responsibility of the Supervisors to ensure that this entire procedure is followed at all times.

## 4.0 PAPER RETENTION SCHEDULE

<b>RFL Electronics Inc.</b>			
<b>SUBJECT: RECORD RETENTION POLICY AND PROCEDURE</b>	<b>EFFECTIVE DATE:</b> <b>MARCH 1, 2005</b>	<b>NO:</b>	<b>REV:</b>
	<b>ISSUED BY:</b> <b>D. CHEN</b>	<b>QP-109</b>	<b>A</b>
	<b>APPROVED BY:</b> <b>U. PFEIL</b>	<b>PAGE 4 OF 7</b>	

Proper Storage and compliance with the following Retention Schedule is the responsibility of Controller, Officers, Managers, and Supervisors.

<b>TYPE OF RECORD</b>	<b>DESCRIPTION</b>	<b>RETENTION PERIOD</b>
<b>Accounts Payable</b>	Accounts Payable Checks – Canceled	4 Years
	Accounts Payable Paid Invoices with Check Copy, Credit and Debit Memos	4 Years
	Accounts Payable – Trial Balance – Monthly	4 Years
	Accrued Accounts Payable Report - Monthly	4 Years
	Voucher Register Detail	Current Year Only
	Travel Expense Reports	4 Years
	Check Register – Batch Detail	Current Year Only
	Check Register – Monthly Summaries	4 Years
	Accounts Receivable Detail (Paid Invoices)	4 Years
<b>Accounts Receivable</b>	Accounts Receivable Monthly Aged Trial Balance	4 Years
	Remittance Advice	4 Years
	Bank Statements, Reconciliation, Cancelled and Voided Checks, Stop Payments Notices, all Accts	4 Years
<b>General Accounting</b>	Cash Journal	4 Years
	General Ledger (Trial Balance)	Permanent
	Financial Statements	Permanent
	Journal Entries	Permanent
	Orders Received – Monthly Detail	2 Years
	Orders Received – Summaries (Sales History)	10 Years
	Shipments – Monthly Detail	4 Years
	Sales Journal	4 Years
	Sales Orders with PO's and Supporting Documents	10 Years
	PCM Inventory (Project Cost)	3 Years
<b>Cost Accounting</b>	Cycle Count Reports	4 Years
	Physical Inventory – Run and Cards	4 Years
	Bank Statements, Reconciliation, Stop Payment Notices (Payroll Account)	6 Years
<b>Payroll</b>	Payroll Checks (Cancelled and Void)	4 Years
	Payroll Register	8 Years
	Time and Attendance (Hourly Employees)	7 Years
	Labor Tickets/Time & Attendance (Salaried Empl)	7 Years
	W-2 Forms	Permanent
	W-4 Forms	1 Year after termination
	Employee Records	Permanent
	Group Insurance Contracts	3 Years or until contract ends
<b>401(k) and Profit Sharing Plan</b>	Pension and Profit Sharing Plan Documents. Audits, Discrimination Tests, Communication Employee Forms	Permanent

<b>RFL Electronics Inc.</b>			
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	<b>ISSUED BY:</b> <b>D. CHEN</b>	<b>QP-109</b>	<b>A</b>
	<b>APPROVED BY:</b> <b>U. PFEIL</b>	<b>PAGE 5 OF 7</b>	

**PAPER RETENTION SCHEDULE continued .....**

<b>TYPE OF RECORD</b>	<b>DESCRIPTION</b>	<b>RETENTION PERIOD</b>
<b>Fixed Assets</b>	Capital Asset Records	4 Years after disposal of asset
<b>Purchase Orders</b>	Purchase Order copies with supporting documents, Purchase Requisitions and approvals	3 Years
<b>Receiving Reports</b>	Packing Slips	3 Years plus current year
	Receiving Reports for MRO's only	3 Years plus current year
<b>Quality QA Record</b>	Outlined in the Quality Records Policy	Ref. QP-024
<b>Legal (Litigation) and Environmental Records</b>	Case Support and Final Resolution Documents	Permanent
<b>Contracts</b>	Any Contract	6 Years after expiration
<b>Tax Returns</b>	Income Tax Returns (FIT/SIT)	Permanent
	Franchise Tax Returns	Permanent
	Sales and Use Tax Returns	Permanent
	Excise Tax Returns	Permanent
	Payroll Tax Returns	Permanent
<b>All Other</b>	Record retention for quotes and customer service or other operational documents are retained at the discretion of the Department Manager or Officer. When in doubt – ask the Controller or Officer.	To be determined

## **5.0 ELECTRONIC RETENTION SCHEDULE**

- 5.1 Proper storage and compliance with the following Electronic Record Retention Schedule is the responsibility of the IT Director.

<b>RFL Electronics Inc.</b>				
<b>SUBJECT:</b> <b>RECORD RETENTION POLICY</b> <b>AND PROCEDURE</b>	<b>EFFECTIVE DATE:</b>	<b>MARCH 1, 2005</b>	<b>NO:</b> <b>QP-109</b>	<b>REV:</b> <b>A</b>
	<b>ISSUED BY:</b>	<b>D. CHEN</b>		
		<b>APPROVED BY:</b>	<b>U. PFEIL</b>	<b>PAGE 6 OF 7</b>

5.2 AS/400 PRMS Electronic Data Retention:

The following is purged automatically through the PRMS System Control.  
(Maintained by the IT Director who sets purge criteria in the PRMS System):

AS400 PRMS Menu/Module/Database	Purged to History File	History Inquiry Available	Minimum Retention Period
Inventory Transactions	550 days	Yes	10 Years
Sales Orders	999 days	Yes	20 Years
Work Orders	999 days	Yes	10 Years
Accounts Receivable	730 days	No	6 Years
Accounts Payable	999 days	No	6 Years
Purchase Orders	550 days	Yes	10 Years
Product Structure Part Changes	999 days (not retained in history file)		

5.3 The following Electronic Data Remains in the Active Files.  
(Maintained by the IT Director who will purge when required):

AS400 PRMS Menu/Module/Database	Purged to History File	History Inquiry Available	Minimum Retention Period
General Ledger	N/A	N/A	Permanent
Material Request	N/A	N/A	3 Years
Project Cost – Header	N/A	N/A	6 Years
Project Cost – Detail	N/A	N/A	3 Years
Service Work Order	N/A	N/A	10 Years
Commission	N/A	N/A	4 Years
Matl Shipment/Debit Memo	N/A	N/A	4 Years
Labor	N/A	N/A	4 Years
Payroll (T&A)	N/A	N/A	7 Years
Sales Order Tracking	N/A	N/A	20 Years
Sales Quote	N/A	N/A	5 Years
Product Eng Drawing	N/A	N/A	Permanent
Product Eng Menu (ECO)	N/A	N/A	3 Years after Completion
Controlled Action Request	N/A	N/A	3 Years after completion

RFL Electronics Inc.			
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	APPROVED BY: <b>U. PFEIL</b>	PAGE <b>7</b> OF <b>7</b>	

#### 5.4 Network System and Data Retention

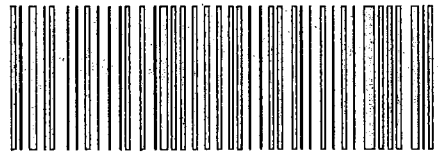
- 5.4.1 Backup of the Company's Network takes place every day and therefore it is retained indefinitely. However, the user is encouraged to periodically purge files and data that is no longer required. Note: A formal purge by the IT staff is executed only at the discretion and approval of the application user.

**END OF PROCEDURE**

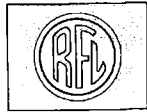
Attachments

Sample of Retention Label

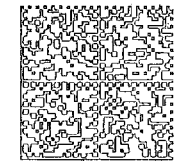
VERIFIED MAIL



7006 3450 0002 1031 0406



RFL Electronics Inc.  
353 Powerville Road  
Boonton Township, New Jersey 07005-

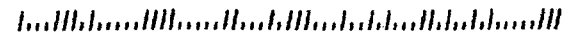


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Mr. Harry R. Steinmetz (3HS62)  
US Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

DEC 03 2012

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